

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:21-cr-043

v.

Hon. Robert J. Jonker
Chief United States District Judge

JEREMY TYLER SWINK,

Defendant.

/

DEFENDANT'S MOTION FOR DOWNWARD VARIANCE

Jeremy Tyler Swink, through his attorney, Helen C. Nieuwenhuis of the Office of Federal Public Defender, moves this Honorable Court to vary downward from the applicable advisory guideline range in this matter. Under the 18 U.S.C. § 3553(a) factors and the standard for the imposition of a sentence sufficient, but not greater than necessary, a downward variance would be appropriate in this case. The basis for this requested variance is further set forth and supported in the Presentence Report and in Defendant's Sentencing Memorandum filed on this day as well.

Respectfully submitted,

SHARON A. TUREK
Federal Public Defender

Dated: June 30, 2021

/s/ Helen C. Nieuwenhuis

HELEN C. NIEUWENHUIS
First Assistant Federal Public Defender
50 Louis, NW, Suite 300
Grand Rapids, Michigan 49503
(616) 742-7420